

**EXHIBIT 95**  
**Unredacted Version of**  
**Document Sought to be Sealed**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843  
CONSUMER USER PROFILE Case No.  
LITIGATION 18-md-02843-VC-JSC

This document relates to:

## ALL ACTIONS

\* \* CONFIDENTIAL \* \*

ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)  
CORPORATE REPRESENTATIVE - MICHAEL DUFFEY  
(Reported Remotely via Video & Web Videoconference)  
Palo Alto, California (Deponent's location)

Wednesday, June 2, 2022

Volume I

STENOGRAPHICALLY REPORTED BY:

REBECCA L. ROMANO, RPR, CSR, CCR

California CSR No. 12546

Nevada CCR No. 827

Oregon CSR No. 20-0466

Washington CCR No. 3491

JOB NO. 5234611

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14  
15 DEPOSITION OF MICHAEL DUFFEY, taken on  
16 behalf of the Plaintiffs, with the deponent located  
17 in Palo Alto, California, commencing at  
18 9:14 a.m., Wednesday, June 3, 2022, remotely  
19 reported via Video & Web videoconference before  
20 REBECCA L. ROMANO, a Certified Shorthand Reporter,  
21 Certified Court Reporter, Registered Professional  
22 Reporter.

1 APPEARANCES OF COUNSEL

2 (All parties appearing via Web videoconference)

3

4 For the Plaintiffs:

5 BLEICHMAR FONTI & AULD LLP

6 BY: LESLEY E. WEAVER

7 BY: ANNE K. DAVIS

8 BY: JOSHUA SAMRA

9 Attorneys at Law

10 555 12th Street

11 Suite 1600

12 Oakland, California 94607

13 (415) 445-4003

14 lweaver@bfalaw.com

15 adavis@bfalaw.com

16 jsamra@bfalaw.com

17

18

19

20

21

22

23

24

25 //

1 APPEARANCES OF COUNSEL

2 (All parties appearing via Web videoconference)

3

4 KELLER ROHRBACK L.L.P.

5 BY: CARI CAMPEN LAUFENBERG

6 BY: DEREK W. LOESER

7 Attorneys at Law

8 1201 Third Avenue

9 Suite 3200

10 Seattle, Washington 98101

11 (206) 623-1900

12 claufenberg@kellerrohrback.com

13 dloeser@kellerrohrback.com

14

15 For Facebook, Inc.:

16 GIBSON, DUNN & CRUTCHER LLP

17 BY: RUSSELL H. FALCONER

18 Attorney at Law

19 2001 Ross Avenue

20 Suite 2100

21 Dallas, Texas 75201

22 (214) 698-3170

23 rfalconer@gibsondunn.com

24

25 ////

1 APPEARANCES OF COUNSEL (cont'd)

2 (All parties appearing via Web videoconference)

3

4 For Facebook, Inc.:

5 GIBSON, DUNN & CRUTCHER LLP

6 BY: YEKATERINA REYZIS

7 Attorney at Law

8 333 South Grand Avenue

9 Los Angeles, California 90071-3197

10 (213) 229-7907

11 yreyzis@gibsondunn.com

12 and

13 BY: DAYNA ZOLLE HAUSER

14 BY: HANNAH REGAN-SMITH

15 Attorneys at Law

16 1801 California Street

17 Suite 4200

18 Denver, Colorado 80202-2642

19 (303) 298-5700

20 dzhauser@gibsondunn.com

21 hregan-smith@gibsondunn.com

22

23

24

25 //

1 APPEARANCES OF COUNSEL (cont'd)

2 (All parties appearing via Web videoconference)

3

4 For Facebook, Inc.:

5 GIBSON, DUNN & CRUTCHER LLP

6 BY: ROSEMARIE T. RING

7 Attorney at Law

8 555 Mission Street

9 Suite 3000

10 San Francisco, California 94105-0921

11 (415) 393-8247

12 rring@gibsondunn.com

13

14 JAMS

15 BY: DANIEL B. GARRIE

16 Special Master

17 555 W. 5th Street

18 32nd Floor

19 Los Angeles, California 90013

20 (213) 253-9706

21 dgarrie@jamsadr.com

22

23

24

25 /////

1 APPEARANCES (cont'd)

2 (All parties appearing via Web videoconference)

3

4 ALSO PRESENT:

5 Ian Chen, Associate General Counsel,  
6 Meta Platforms

7 John Macdonell, Videographer

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10:05:06

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1 Q. What is the law enforcement response 10:05:07  
2 team?

3 A. That -- that team is -- is -- receives  
4 subpoenas and requests from law enforcement  
5 regarding individual users at Facebook. 10:05:31

6 [REDACTED]  
7 [REDACTED]

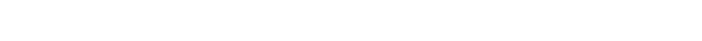
8 MR. FALCONER: Objection. Beyond the  
9 scope of the notice.

10 And, Mr. Duffey, again, I'll just caution 10:05:49  
11 you: Don't reveal any privileged communications  
12 you may have had in the course of your work at the  
13 company in answering that question.

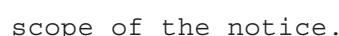
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED] 10:07:07

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10:08:42



Q. (By Ms. Weaver) Who would know?



MR. FALCONER: Same objection.



THE DEPONENT: Somebody -- somebody on

10:09:03

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17 Q. And when you say "groups," what do you



mean?



A. Facebook groups.



Q. And can you state for the record what

10:47:44



Facebook groups are?



A. Sure. I'm sorry.



Q. No problem.



A. A group is -- how would I -- if you have



an interest in a specific topic, for instance,

10:48:05

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1 surfing, there could be a group established or -- 10:48:10  
2 or created or in existence that is related to  
3 surfing that you could, you know, join and interact  
4 with others that are not necessarily your -- or not  
5 your friends, but people that have the same level 10:48:29  
6 of interest.

7 So that is the -- a way to interact  
8 outside of your network of -- of friends.

9 [REDACTED]  
[REDACTED] 10:49:49

1 A. I -- I could find out that information. 11:01:05  
2 I just don't know that sitting here. Counsel for  
3 Gibson Dunn could -- could also get that  
4 information. Our E-discovery team would know. I  
5 just -- I just don't know the answer to that 11:01:17  
6 question as I sit here.

7 Q. Okay.

8 And do you see that in your notes here,  
9 you refer to "TAO," the associations and objects  
10 database? 11:01:41

11 A. Yes.

12 Q. Is it fair to call it a database?

13 A. I don't know. I don't know if it would  
14 be called a database.

15 Q. Let's call it a data source. Fair 11:01:53  
16 enough.

17 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] 11:02:53



